



CONVERTING THE SOLID WASTE STREAM TO ETHANOL

April 28, 2005

**MADAME CHAIR AND BOARD MEMBERS
CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD
1000 "I" STREET
SACRAMENTO, CA**

RE: PUBLIC COMMENT – AB 1497

Dear Madame Chair and Board Members:

We have grave reservations about how AB 1497 will affect permitting for co-located Conversion Technology (CT) plants at previously operated solid waste facilities in California. As you well know, permitting for CT's is already complicated, thorough and overseen by many California agencies and permitting entities currently. We believe that this system adequately addresses public input as CT's go through the process of site selection and building.

In particular, our concerns revolve around the following issues:

- These pending regulations as presented (April 7, 2005) would trigger Public Hearings for any CT facility planned at any solid waste facility. As an example: if the CUP gets a "Negative Declaration" ... the LEA could and possibly must, notify all concerned that a Public Hearing must take place ... and could trigger a CEQA and/or EIR process. This process could duplicate previous hearings, reports and other efforts; leading to the "never-ending" public hearing process!
- The solid waste companies are inundated with requests for public hearings by numerous agencies and authorities as it is. Why would any solid waste company or municipality open themselves up for another public hearing; the hassles, the time spent and expense of even investigating co-locating a CT at their solid waste site? If Conversion Technology operations would be considered a "significant change" ... then, this would represent a major roadblock for developing CT's; and
- This process, at the end of the day, would probably force CT's to become separated from their feedstocks and go the manufacturing route.

Instead of making it more difficult to co-locate CT's with their feedstock (as AB 1497 regulations are presently proposed) we should make it public policy to keep solid waste feedstocks at the same facility! It is environmentally beneficial to process these materials in an enclosed and confined area, rather than forcing further transportation of these vital raw materials to another site.

Any consideration that the Board could give to defining Conversion Technologies in a category that would not be considered a "significant change" would greatly increase the chances of Conversion Technologies to be developed in California.

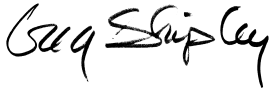
WASTE TO ENERGY

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California is in desperate need, both environmentally and economically, of the bio-fuels and other bio-products produced by these technologies ... as well as electricity and other forms of power and energy!

Your consideration of these facts (when you implement AB 1497) would be greatly appreciated.

Best Regards,
WASTE TO ENERGY

A handwritten signature in black ink that reads "Greg Shipley". The signature is written in a cursive, flowing style.

Greg Shipley
President and California Partner of Genahol, Inc.